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*Attorneys for Defendant State Farm Mutual Automobile Insurance Company*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA, SOUTHERN DIVISION**

\* \* \*

ROSE DESIO.

Plaintiff.

VS

**STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY; DOES I-V and  
ROES VI-X, inclusive**

### Defendants.

CASE NO. 2:20-cv-1486-APG-NJK

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
RESPONSE TO PLAINTIFF'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

### [Third Request]

19 DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY  
20 (“Defendant”), by and through its counsel of record, the law firm of LEWIS BRISBOIS  
21 BISGAARD & SMITH LLP, and PLAINTIFF ROSE DESIO (“Plaintiff”), by and through her  
22 counsel of record, JESSE SBAIH & ASSOCIATES, LTD., hereby stipulate and agree that the  
23 time for Defendant to file its Response to Plaintiff’s Motion for Partial Summary Judgment be  
24 extended as set forth herein. Defendant State Farm’s Response is currently due December 21,  
25 2020. The parties hereby stipulate that the due date for Defendant’s Response be extended to  
26 January 1, 2021.

## Reason for Extension

**28** Plaintiff's Motion for Partial Summary Judgment addresses a nuanced issue of law

1 regarding the enforceability of Defendant's anti-stacking provision in the Nevada Car Policy it  
2 issued to Plaintiff. Defendant requires additional time to address Plaintiff's claims effectively  
3 prior to filing its Response. This stipulation is made in good faith and not for the purpose of  
4 delay.

5 This is the third extension of time requested for filing Defendant's Response to Plaintiff's  
6 Motion for Partial Summary Judgment.

7 DATED this 21th day of December, 2021.

DATED this 21th day of December, 2021.

8 LEWIS BRISBOIS BISGAARD & SMITH

JESSE SBAIH & ASSOCIATES, LTD.

9 */s/Tara U. Teegarden*

*/s/Jesse M. Sbaih*

10 ROBERT W. FREEMAN  
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Nevada Bar No. 11431  
The District at Green Valley Ranch  
170 South Green Valley Parkway, Suite 280  
Henderson, Nevada 89012  
Attorneys for Plaintiff

15

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**ORDER**

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IT IS SO ORDERED.

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Dated this 22nd day of December, 2020.

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U.S. DISTRICT COURT JUDGE

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1                   **CERTIFICATE OF SERVICE**

2                   I HEREBY CERTIFY that on the 21th day of December, 2020, I electronically filed the  
3 foregoing **THIRD STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE**  
4 **RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** with  
5 the Clerk of the Court through Case Management/Electronic Filing System.

6  
7 Jesse M. Sbaih  
Ines Olevic-Saleh  
8 JESSE SBAIH & ASSOCIATES, LTD.  
The District at Green Valley Ranch  
9 170 South Green Valley Parkway, Suite 280  
Henderson, Nevada 89012  
10 [isbaih@sbaihlaw.com](mailto:isbaih@sbaihlaw.com)  
[iolevic@sbaihlaw.com](mailto:iolevic@sbaihlaw.com)

11 *Attorneys for Plaintiff*  
12

13                   By /s/ Anne Cordell  
14                   An Employee of LEWIS BRISBOIS BISGAARD  
15                   & SMITH LLP

**Archived:** Monday, December 21, 2020 2:52:46 PM

**From:** Teegarden, Tara

**Sent:** Monday, December 21, 2020 2:45:36 PM

**To:** Cordell, Anne

**Cc:** Freeman, Robert; Freeman, Kristen; Grames, Cheryl

**Subject:** FW: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Third SAO to extend

**Response requested:** No

**Sensitivity:** Normal

---

Hi Anne, this needs to be filed today. Will you have time to do it? Thanks.

Tara

**Tara U. Teegarden**

**Attorney**

Las Vegas Rainbow

702.693.1716 or x7021716

---

**From:** Jesse Sbaih <jsbaih@sbaihlaw.com>

**Sent:** Monday, December 21, 2020 2:34 PM

**To:** Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com>

**Cc:** Cordell, Anne <Anne.Cordell@lewisbrisbois.com>; Freeman, Kristen <Kristen.Freeman@lewisbrisbois.com>; Freeman, Robert <Robert.Freeman@lewisbrisbois.com>; Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; Ines <iolevic@sbaihlaw.com>; Jennifer Davidson <jdavidson@sbaihlaw.com>

**Subject:** [EXT] RE: Desio, Rose v. SFMAIC, et al. -Third SAO to extend

External Email

Hi Tara...it's my pleasure to provide you the extension! Please proceed with filing the attached document with my e-sig.

Happy Holidays!

Jesse M. Sbaih, Esq.

JESSE SBAIH & ASSOCIATES, LTD.

The District at Green Valley Ranch

170 South Green Valley Parkway, Suite 280

Henderson, Nevada 89012

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----- Original Message -----

Subject: Desio, Rose v. SFMAIC, et al. -Third SAO to extend  
From: "Teegarden, Tara" <[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)>  
Date: Mon, December 21, 2020 2:12 pm  
To: Jesse Sbaih <[jsbaih@sbaihlaw.com](mailto:jsbaih@sbaihlaw.com)>  
Cc: "Cordell, Anne" <[Anne.Cordell@lewisbrisbois.com](mailto:Anne.Cordell@lewisbrisbois.com)>, "Freeman, Kristen"  
<[Kristen.Freeman@lewisbrisbois.com](mailto:Kristen.Freeman@lewisbrisbois.com)>, "Freeman, Robert"  
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Davidson <[jdavidson@sbaihlaw.com](mailto:jdavidson@sbaihlaw.com)>

Hi Jesse,

It was nice speaking with you on Friday. Thank you again for providing me with this extension. It is greatly appreciated. I have attached the third draft SAO to extend the briefing schedule for your review. Please let me know if you have any edits you would like made. If not, do I have your permission to use your e-sig?

Sincerely,

Tara



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